

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Decision _____

Application of Southern California Edison Company (U338E) for Authority to, among other things, Increase its Authorized Revenues for Electric Service in 2015, and to reflect that increase in Rates.

Application 13-11-003
(Filed November 12, 2013)

DECISION AWARDING INTERVENOR COMPENSATION TO THE UTILITY REFORM NETWORK FOR SUBSTANTIAL CONTRIBUTION TO DECISION 15-11-021

Intervenor: The Utility Reform Network	For contribution to Decision (D.) 15-11-021
Claimed: \$ 1,587,345.95	Awarded: \$1,593,514.06
Assigned Commissioner: Carla J. Peterman	Assigned ALJ: Kevin Dudney

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	Decision (D.) 15-11-021 resolves Southern California Edison Company's (SCE) test year 2015 general rate case. The decision adopted a 2015 revenue requirement representing the reasonable costs of providing safe and reliable electrical distribution service to SCE's customers in that year. SCE proposed a test year revenue requirement of \$5.512 billion; the Commission authorized \$5.182 billion, an amount that was \$330 million lower. For the 2016 and 2017 attrition year increases, the Commission authorized figures approximately \$27-\$50 million lower than SCE had requested for each year.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	2/11/14	Verified.
2. Other specified date for NOI:		
3. Date NOI filed:	2/18/14	Verified.
4. Was the NOI timely filed?		Yes, The Utility Reform Network (TURN) timely filed

		the notice of intent to claim intervenor compensation.
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	Made as part of Notice of Intent here -- A.13-11-003 (SCE 2015 GRC)	Verified. <i>See</i> Ruling in I.13-03-007.
6. Date of ALJ ruling:	9/6/13	Verified.
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		Yes, TURN demonstrated appropriate status.
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	A.12-11-009/I.13-03-007 (PG&E 2014 GRC), as cited in NOI here	Verified.
10. Date of ALJ ruling:	9/6/13	Verified.
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes, the Ruling in I.13-03-007 provided TURN with a one-year rebuttable presumption of significant financial hardship, which was applied in the present proceeding.
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.15-11-021	Verified.
14. Date of issuance of Final Order or Decision:	11/12/15	Verified.
15. File date of compensation request:	1/11/16	Verified.
16. Was the request for compensation timely?		Yes, TURN timely filed the request for intervenor compensation.

C. Additional Comments on Part I (use line reference # as appropriate):

#	Intervenor's Comment(s)	CPUC Discussion
4, 8, 12	TURN did not receive an affirmative ruling on its Notice of Intent in this proceeding, consistent with the explanation in the Commission's Intervenor Compensation guide (p. 12) that such rulings may not issue absent a request for a finding of "significant financial hardship," a deficiency in the NOI, or when the ALJ desires to provide guidance.	Verified. TURN satisfied the eligibility requirements found in §§ 1801 – 1812.

PART II: SUBSTANTIAL CONTRIBUTION**A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059).**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
Overview: This GRC proceeding covered an array of issues associated with SCE's generation and distribution utility functions. TURN submitted testimony from eight witnesses on a wide variety of those issues, and addressed additional issues through our cross-examination of SCE witnesses during the evidentiary hearings. As described in more detail below, TURN's efforts resulted in a substantial contribution on the vast majority of issues addressed in our testimony and briefs. In D.15-11-021, the adopted outcomes on the issues TURN addressed were generally consistent with TURN's recommendation. Even where the Commission did not adopt TURN's recommended outcome even in part, it often cited with favor TURN's analysis of the issue. Therefore the Commission should have no trouble determining that TURN's substantial contribution on the wide array of issues addressed in this GRC warrants the requested award of compensation.	TURN relies largely on our opening brief as the source for citations to where the arguments and evidence supporting our substantial contributions appear in the record of this proceeding. The cited section from that brief should point the Commission toward the prepared and oral testimony and other record evidence supporting TURN's position. Should the Commission conclude that it needs further support for any of the substantial contributions described here, TURN requests an opportunity to supplement this showing with additional citations as appropriate.	Verified.
1. Overall outcome – The Commission calculated approved a test year 2015 revenue requirement of \$5.182 billion, or \$330 million less than SCE's updated request of \$5.512 billion. TURN can take credit for a substantial portion of this reduction of \$330 million for 2015.	D.15-11-021, p. 2.	Verified.
2. Policy – Forecasting Techniques and Use of 2013 Recorded Costs: TURN's forecasts often relied on 2013 recorded costs, an approach generally	TURN Opening Brief, §2.2.2	Verified.

opposed by SCE. The Commission recognized that reliance on 2013 data could be appropriate depending on the specific circumstances of the matter subject to the forecast.	D.15-11-021, §5.1, p. 14.	
3. Nuclear Generation – Nuclear Energy Institute Dues: TURN called for disallowance of 50% (\$123,000) of the NEI dues, consistent with the treatment in past GRCs. The Commission adopted this recommendation.	TURN Opening Brief, §5.3.1 D.15-11-021, §6.3, p. 16.	Verified.
4. Hydro Generation O&M: TURN proposed several reductions that SCE accepted in its rebuttal testimony. In addition, TURN recommended use of averages from different periods for Accounts 536, 539 and 545, and exclusion of San Geronio costs. The Commission adopted TURN's recommendations in part for Account 536 and San Geronio, resulting in a reduction of approximately \$300,000.	TURN Opening Brief, §5.5. D.15-11-021, §6.5.1, p. 20.	Verified.
5. Mountainview O&M: TURN proposed a number of reductions and changes to SCE's Mountainview forecasts. SCE accepted many of them, resulting in a reduction of approximately \$1.66 million.	TURN Opening Brief, §5.6.1. D.15-11-021, §6.6.1.1 p. 21	Verified.
6. Peakers O&M: TURN recommended using 2013 recorded figures for the McGrath peaker, and a 2-year average for Accounts 549 and 554. The Commission adopted TURN's recommendation for McGrath, and appears to adopt at least a portion of other elements of TURN's recommendation.	TURN Opening Brief, §5.6 D.15-11-021, §6.6.2.1 (pp. 26-27)	Verified.
7. Catalina O&M and Capital: Catalina – TURN proposed O&M adjustments of \$236,000 based on excluding non-recurring costs; SCE agreed with those adjustments. TURN's primary capital recommendation sought a cap at \$5.1 million due to cost overruns on the Pebbly Beach project. The Commission largely agreed with TURN's recommendation, although it allowed slightly more for capital spending than TURN had recommended.	TURN Opening Brief, §5.7.2 D.15-11-021, §6.7.2. (pp. 32-33)	Verified.
8. T&D Policy – Reliability Investment Incentive Mechanism (RIIM): TURN and CUE submitted a joint statement on the capital spending element of RIIM, proposing a one-way balancing account that was based largely on TURN's RIIM testimony. The Commission adopted the joint statement's recommendation with slight modifications, and cited TURN's arguments countering SCE's claims regarding limited available staffing.	TURN Opening Brief, §6.1 D.15-11-021, §7.1.1 (pp. 38, 40)	Verified.
9. T&D – Centralized Remedial Action Scheme	TURN Opening Brief, §6.2.1	

<p>(CRAS): TURN objected to SCE’s funding request because SCE had not shown benefits outweighed costs, and recommended reducing O&M by \$43,000, denying all capital (\$10-11 mm in 2014-15, \$23 mm in 2016, \$34 mm in 2017). The Commission deemed TURN’s argument “compelling” but adopted partial funding for policy reasons, approving recovery of the recorded capital amount for 2013, but denying capital and O&M for later years.</p>	<p>D.15-11-021, §7.2.1 (pp. 43-44)</p>	<p>Verified.</p>
<p>10. T&D – Underground Cable Programs: TURN argued SCE should have increased Testing-Based Life Extension Program, and proposed reductions to SCE’s forecasted miles and unit costs. The Commission agreed with TURN that dramatically increasing the rate of cable replacement before the results of testing program are understood or realized is questionable; but adopted smaller reductions to the forecasted miles to be replaced and CIC unit costs (based on TURN's estimate for trenchless work). As a result, there was a \$23 mm reduction in 2014 capital, and \$27 mm in 2015. capital</p>	<p>TURN Opening Brief, §6.4.1 and 6.4.2. D.15-11-021, §7.4.1.4, pp. 72-74</p>	<p>Verified.</p>
<p>11. T&D – A-Bank Transformers: TURN proposed a reduction to the number of replacements forecasted per year based on historical replacement data. The Commission was “swayed” by TURN’s argument on the historical replacement rates, but adopted a smaller than recommended reduction.</p>	<p>TURN Opening Brief, §6.4.3 D.15-11-021, §7.4.2, p. 77</p>	<p>Verified.</p>
<p>12. T&D – Distribution Circuit Breaker Replacement: TURN challenged SCE’s replacement rate as inadequately justified. The Commission agreed with TURN, but also found SCE had demonstrated that some increase over the historical rate is warranted, and adopted a figure approximately 20% below SCE’s request, resulting in a reduction of approximately \$6 million in capital in both 2014 and 2015.</p>	<p>TURN Opening Brief, §6.4.4 D.15-11-021, §7.4.3, p. 80.</p>	<p>Verified.</p>
<p>13. T&D – Underground Structure Rehabilitation Program: TURN challenged the SCE-proposed failure rate assumption, while accepting SCE’s proposed unit costs. The Commission adopted a reduction to the utility’s forecast, in part based on its agreement with TURN that SCE's explanation of its assumed increased failure rate is inadequate to justify the requested increase in costs. The reduction was approximately 20% to O&M and capital (incorporating TURN’s</p>	<p>TURN Opening Brief, §6.6.1 D.15-11-021, §7.6.1, pp. 96-97</p>	<p>Verified.</p>

and ORA's recommendations), for a \$3.3 million O&M reduction and approximately \$15 million in capital for both 2014 and 2015.		
<p>14. T&D – Inspection and Maintenance O&M – Joint Pole Expenses: TURN proposed increased joint pole credits based on the existing credits reflecting unit costs that were unduly low, and the likelihood of increased penalties from increased inspection and maintenance activities. TURN also called for review of rates for pole credits. The Commission explicitly agreed with TURN's logic, and adopted an increase of nearly \$2 million to the pole credit revenue forecast. It also agreed with TURN that a review of the rates for pole credits is worthwhile, and directed SCE to present information for such a review in its next GRC.</p>	<p>TURN Opening Brief, §6.7.2.3</p> <p>D.15-11-021, §7.6.3.1.3 (p. 104)</p>	Verified.
<p>15. T&D – Pole Replacement Unit Cost: TURN challenged use of 2012 recorded data due to cost increases from 2009-12 being much greater than inflation, and called for the need for SCE to better control its pole replacement costs. The Commission adopted a 3% reduction to the unit costs to give SCE the incentive to contain its unit costs.</p>	<p>TURN Opening Brief, §6.7.2.1.</p> <p>D.15-11-021, §7.6.4.1 (p. 107).</p>	Verified.
<p>16. T&D – Aged Pole Replacements: SCE proposed to increase its replacement of "aged poles" as a transition to its Pole Loading Program, and forecast 14,500 aged pole replacements in 2014, 1,898 in 2015. TURN challenged SCE's analysis, and called for using other high priority poles for PLP "ramp up" purposes instead of simply removing older poles. The Commission rejected SCE's argument that the replacements that had already occurred were "used and useful" and therefore should be recovered in rates, and stated that SCE had not demonstrated the prudence of its requested replacement levels. It approved 9,000 replacements in 2014, and zero in 2015.</p>	<p>TURN Opening Brief, §6.7.4</p> <p>D.15-11-021, §7.6.4.3 (pp. 112-113)</p>	Verified.
<p>17. T&D – Pole Loading Program: TURN challenged the forecasted number and timing of replacements, as well as the cost recovery for joint poles in the program. TURN called for consideration of removing attachments (rather than replacing the pole) to remediate overloaded pole, and argued that pre-existing cost allocation practices between SCE and pole attachers may not be appropriate for PLP replacements. TURN also recommended a study to see if attachment fees are below cost of service. TURN proposed an additional reduction to the forecast number to reflect</p>	<p>TURN Opening Brief, §6.7.3</p> <p>D.15-11-021, §7.7.3.1.3 (pp. 134-141)</p>	Verified.

<p>overlap with replacements under other programs.</p> <p>The Commission agreed at least in part with nearly all of TURN's criticisms and recommendations. It found SCE has not explored all appropriate alternatives for imposing related costs on joint pole users, but did not adopt a specific fee or surcharge at this time. It did, however, direct SCE to present evidence in its next GRC of its attempts to pursue more optimal solutions for having joint pole users bear part of the burden of such pole replacements. The Commission also reduced the forecast of PLP replacements due to overlap in programs, and included a 20% efficiency gain in the adopted replacement rate. The adopted amount for 2015 capital is approximately \$100 mm below SCE's request.</p>		
<p>18. T&D – Streetlights: TURN argued SCE had not justified the need to replace all steel streetlight poles, and recommended spending of \$5.66 mm for 2014 and 2015. TURN also disputed SCE's unit cost, and recommended a 5% lower figure of \$5,972 per pole. The Commission agreed with TURN regarding use of recently recorded data to calculate the unit costs, and adopted \$6,000 per pole. The Commission also agreed with TURN that SCE had not presented adequate analysis or support to justify its proposed replacement of all 70,000 poles, and adopted TURN's proposed unit counts, with a slight increase.</p>	<p>TURN Opening Brief, §6.8.1</p> <p>D.15-11-021, §7.8.2.2 (pp. 157-159)</p>	Verified.
<p>19. Customer Service – Meter Reading Operations: TURN recommended a reduction of \$558,000 for manual readings of Non-Opt Out meters. The Commission found TURN's proposed reduction reasonable.</p>	<p>TURN Opening Brief, §7.1.1</p> <p>D.15-11-021, §8.1.1 (p. 193)</p>	Verified.
<p>20. Customer Service – Project Management Organization: TURN recommended a forecast of \$5.7 million, a \$1.71 reduction from SCE request, based in part on the 2013 recorded costs being substantially below the forecast for that year. The Commission adopted ORA's forecast of \$6.343 million, but cited TURN's point that the 2013 recorded results being so different than the 2013 forecast "calls the validity of SCE's forecast increases into question."</p>	<p>TURN Opening Brief, §7.1.5</p> <p>D.15-11-021, §8.1.5 (pp. 199-200)</p>	Verified.
<p>21. HR, Benefits and Other Compensation – General: TURN's general approach relied on the</p>	<p>TURN Opening Brief, §9.3.</p>	

distinction between costs of incentive programs designed to further objective other than providing safe and reliable service at just and reasonable rates, and the need to exclude such costs even in the face of SCE's total compensation arguments. The Commission agreed with this general approach, and cautioned SCE against relying on "logical fallacies" underlying its arguments to the contrary.	D.15-11-021, §10 (pp. 256-257)	Verified.
22. HR, Benefits and Other Compensation -- Executive Officer Expenses: -- TURN argued 60% of Executive Incentive Compensation (EIC) goals are tied to financial performance or lobbying and should not be funded in rates. The Commission agreed, and authorized rate recovery of 40% of SCE's EIC forecast.	TURN Opening Brief, §9.3.4 D.15-11-021, §10.1.1 (pp. 260-261)	Verified.
23. HR, Benefits and Other Compensation -- STIP: TURN recommended retaining 10.94% factor for calculating STIP forecast from last GRC decision, reduced rate funding of non-officer executive incentive payments (60% reduction as above), and other reductions. The Commission agreed with TURN (and ORA) on some elements of the analysis, but declined to make cuts as steep as recommended. Instead, it adopted SCE's proposed ratio, but reduced it by 10% to account for the STIP payout criteria that are not appropriate to charge to ratepayers. It adopted funding of \$98 million, rather than the \$143 million sought by SCE.	TURN Opening Brief, §§ 9.3.2 and 9.3.3. D.15-11-021, §10.2 (pp. 264-265)	Verified.
24. HR, Benefits and Other Compensation -- Long-term incentives: TURN joined ORA and SBUA in opposing rate recovery, consistent with past practice. The Commission rejected rate recovery of long-term incentive program costs.	TURN Opening Brief, §9.4 D.15-11-021, §10.3 (pp. 265-266)	Verified.
25. Safety, Security and Compliance (SONGS Marine Mitigation): TURN recommended denial of rate recovery of SCE's new reef construction forecast because the CCC has not yet required further reef construction, and SCE should attempt to recover from decommissioning trust funds first. TURN also challenged cost estimates for reef construction, and called for a separate application for such costs if the requirement is imposed. The Commission adopted TURN's proposed forecast for ongoing mitigation costs, and agreed with TURN that reef construction cost approval or recovery would be premature given that such construction is not yet required. The Commission found that such cost recovery should be the subject of a separate	TURN Opening Brief, § 10.2.1 D.15-11-021, §11.2.5 (pp. 288-289)	Verified.

application.		
<p>26. Financial, Legal and Operational Services (FL&OS) -- Financial Services: TURN recommended three adjustments to Accts 923/930 -- removal of 50% of Bain Consulting costs from 5-year average (for a \$3.3 mm test year reduction), use of a 2-year average for vendor discounts for Accounts Payable, and removal of 2009 tax consulting costs from five-year average (\$1.9 mm reduction in test year) because they are non-recurring and were removed in past GRCs. The Commission adopted TURN's recommendation on Bain Consulting costs, Accounts Payable vendor discount calculation, and proposal to remove tax consultant costs (SCE had accepted the latter adjustment), for a total of \$9.3 million O&M reduction.</p>	<p>TURN Opening Brief, §11.1</p> <p>D.15-11-021, §12.1.2 (pp. 293-294, and 297)</p>	Verified.
<p>27. FL&OS – Audit Services: TURN recommended a reduction of \$937,000 to SCE's request of \$8.7 mm, to reflect Edison Mission Energy bankruptcy and other adjustments for affiliate-related costs. The Commission found TURN's approach and the resulting forecast reasonable.</p>	<p>TURN Opening Brief, §11.2</p> <p>D.15-11-021, §12.2 (pp. 299-300)</p>	Verified.
<p>28. FL&OS – Legal: TURN proposed reduction of \$1 mm to outside counsel expenses based on removing outlier years from the 5-year average; TURN also supported ORA proposal to eliminate ratepayer funding of board-related benefits and compensation, arguing that SCE's testimony here was not substantially different than last GRC (where rate funding was denied) and SCE's argument of board review serving ratepayer interests is contrary to its Corporate Governance Guidelines. The Commission reduced SCE's outside counsel forecast by \$1 million, as proposed by TURN, and denied rate funding for board-related compensation and benefits, citing with favor TURN's hearing exhibits and brief arguments.</p>	<p>TURN Opening Brief, §11.4.1</p> <p>D.15-11-021, §12.4.1.2 (pp. 308-309)</p>	Verified.
<p>29. FL&OS – Workers' Compensation: TURN opposed the \$14.2 mm reserves portion of SCE forecast. Based on a different 5YA forecast, TURN recommended a \$1.471 million reduction</p>	<p>TURN Opening Brief, §11.4.3</p> <p>D.15-11-021, §12.4.3 (pp. 314-315)</p>	Verified.
<p>30. FL&OS – Corporate Real Estate (CRE) O&M: TURN recommended use of a 3YA from 2011-13, resulting in a reduction of \$2.371 mm before adjustments for cost centers not included in 2013 recorded costs. TURN also recommended</p>	<p>TURN Opening Brief, §11.5.3</p> <p>D.15-11-021, §12.5.4 (pp. 320-321);</p>	Verified.

reduction of \$7.1 million to SCE's rental and lease cost forecasts to reflect 2015-17 lease savings (SCE accepted, with a \$164,000 adjustment). The Commission accepted TURN's 3YA, but with further adjustments for a reduction to SCE's request of approximately \$2 million; and adopted the agreed upon \$7 million reduction to rent and lease forecasts.		
31. FL&OS – CRE Capital: TURN recommended disallowance of contingency funding and project management costs for all projects, and disallowance of numerous specific capital projects. The Commission adopted TURN's recommendation to disallow the contingency amounts related to CRE projects for which funding is authorized for 2015 (328); it also adopted in part the recommendation to disallow project management costs (329-330). The Commission disallowed in whole or in part a number of the specific projects for which TURN recommended disallowance (summary table on 324-325, discussion at 333-352)	TURN Opening Brief, §11.5.4 D.15-11-021, §12.5.5 (pp. 328-30, summary table on 324-325, discussion at 333-352)	Verified.
32. External Relations -- Communications Products: TURN proposed a forecast of \$7.067 million, a reduction of \$4.2 million to SCE's forecast. The Commission adopted TURN's forecast, except for the baseline amount, for a forecast of \$7.34 million (a reduction of \$3.9 million).	TURN Opening Brief, § 12.1 D.15-11-021, §13.1.3 (pp. 356-362)	Verified.
33. External Relations -- Corporate Membership Dues & Fees: TURN proposed a reduction of \$1.745 million to charge shareholders, rather than ratepayers, certain dues. SCE agreed to a \$220,000 reduction. The Commission reduced the EEI dues from \$1.4 million to \$1.0 million, adopting TURN's recommendation in part, and agreed with TURN as to eliminating ratepayer funding for CCEEB and the Civil Justice Association of California (\$157,000).	TURN Opening Brief, § 12.2 D.15-11-021, §13.2 (pp. 363-366)	Verified.
34. Sales and Customer Forecasts: TURN accepted SCE's basic model to forecast housing starts and residential meter sets, but updated it to reflect the latest data and made minor changes to the equations. The Commission found TURN's forecast most reasonable given its use of most recent available information. It adopted TURN's forecast of new meters, and used that meter forecast to develop forecast of the number of customers and, by extension, energy sales.	TURN Opening Brief, §15 D.15-11-021, §16 (pp. 379-380)	Verified.

<p>35. Other Operating Revenue -- Non-Tariffed Products and Services (NTP&S): TURN raised concerns similar to those raised in previous GRCs regarding recording and reporting of "incremental costs" for the NTP&S revenue sharing mechanism. The Commission agreed with TURN that it is appropriate to assign a higher priority to auditing NTP&S, and directed SCE to contract for an independent audit in conjunction with Energy Division.</p>	<p>TURN Opening Brief, §16.1 D.15-11-021, §17 (p. 382)</p>	<p>Verified.</p>
<p>36. Post Test Year Ratemaking (PTYR): TURN proposed a two-part PTYR mechanism, with a rolling 3-year average based on the WPI-IND for O&M, and a 7-year average of SCE's recorded capital expenditures. This approach resulted in an average increase of approximately 3.9% for both 2016 and 2017. The Commission adopted a two-part mechanism that produced increases of 4.04% for 2016 and 5.04% increase for 2017, but declined to adopt escalation based on broad wholesale pricing such as the WPI-IND.</p> <p>TURN argued against SCE's budget-based approach to capital expenditures for PTYR purposes. The Commission made clear it was not adopting SCE's proposed budget-based forecast for capital expenditures during the PTYR period, and cited language from the PG&E GRC decision that had appeared in TURN's opening brief.</p> <p>TURN's comments on the PD flagged what appeared to be a counter-intuitive outcome where the \$270 million calculated as the 2016 PTYR increase was greater than SCE's final requested increase for that year. Between the original PD and D.15-11-021, modifications reduced the 2016 attrition increase from \$270 million (5.23%) to \$209 million (4.04%).</p>	<p>TURN Opening Brief, §§18.3 and 18.4 D.15-11-021, p. 2 and §19.5 (pp. 390-392)</p> <p>TURN Opening Brief, §18.4.1 (and p. 239) D.15-11-021, §19.5 (pp. 391-392)</p> <p>TURN Comments on PD, §II.F.3; Proposed Decision of 9/18/15, p. 2 D.15-11-021, p. 2.</p>	<p>Verified.</p>
<p>37. Depreciation -- General Issues: TURN argued that SCE's showing included a number of significant shortcomings, particularly with its reliance on inadequately supported assertions of "judgment." The Commission agreed with TURN and ORA that there are shortcomings, identifying the need for SCE to do more to explain and justify use of judgment, and to provide considerably more detail in support of SCE's net salvage values.</p>	<p>TURN Opening Brief, §§20.1 and 20.2 D.15-11-021, §21.1 (pp. 397-398).</p>	<p>Verified.</p>

<p>38. Depreciation -- Average Service Lives (ASL) and Survivor Curves: TURN argued that SCE's showing on ASL and survivor curves is generally disappointing and overly reliant on unexplained "judgment," and recommended different life-curve combinations for a number of accounts. The Commission generally agreed with TURN's criticism, and on 4 of the 6 specific accounts addressed by TURN, adopted life-curve combinations either recommended by TURN or very close to TURN's recommendation.</p>	<p>TURN Opening Brief, §20.3.3</p> <p>D.15-11-021, §21.2 (pp. 399-400, summary table at 411).</p>	<p>Verified.</p>
<p>39. Depreciation -- Cost of Removal and Net Salvage: TURN challenged SCE's requested net salvage values for nine plant accounts. For the plant accounts TURN addressed, the Commission adopted net salvage values less negative than requested by the utility for eight accounts. While the Commission did not adopt TURN's recommended NS value for any account, it often cited with favor TURN's critique of SCE's request.</p>	<p>TURN Opening Brief, §20.3.4</p> <p>D.15-11-021, §21.3 (pp. 416, 418, 420 and Summary table, p. 427)</p>	<p>Verified.</p>
<p>40. Depreciation -- Generation Plant Service Life Estimates: TURN recommended a 35-year life for SCE's Peakers (rather than SCE's 25-year life), a 35-year life for Mountainview (rather than SCE's 30-year life), and a 30-year life for Solar PV (rather than SCE's 20-year life). The Commission agreed with TURN's service life estimates for SCE's Peakers and Mountainview, and adopted the 5-year life increase for Solar PV as forecasted as proposed by ORA, but citing also the support of TURN's arguments.</p>	<p>TURN Opening Brief, §20.3.1</p> <p>D.15-11-021, §21.5 (pp. 429-430).</p>	<p>Verified.</p>
<p>41. Taxes -- Repairs Deduction: TURN challenged SCE's tax treatment for its repair costs for 2012, 2013 and 2014 in relation to the forecast tax expense for 2015. TURN argued that SCE's treatment resulted in its ratepayers bearing extra tax expense of \$26.1 million in 2015. TURN argued that SCE should have informed the Commission of the change in tax treatment, and that its recommendation was not retroactive ratemaking because it had an entirely prospective impact. TURN also raised a similar issue with regard to state taxes associated with advanced meters.</p> <p>Regarding repairs deduction issues, the Commission agreed with TURN's recommendation and the arguments presented in support of that recommendation and in opposition to SCE's claims.</p>	<p>TURN Opening Brief, §§21.1 and 21.2.</p> <p>D.15-11-021, §22.2 (pp. 454-455) and §22.3 (pp. 455-456)</p>	<p>Verified.</p>

Instead of adopting TURN's proposed remedy, the Commission instead adopted an approach it described as "inspired by TURN's concerns about equity." It calculated a rate base reduction of \$344.026 million on this basis. For advanced meters, the Commission again agreed with TURN and adopted the recommended \$1.36 million reduction in tax expense.		
42. Rate Base -- Customer Advances: TURN recommended a higher amount for this rate base offset based on its application of the difference between SCE's 2013 forecast and actual amounts to the 2014 and 2015 forecasts. The Commission adopted TURN's forecast.	TURN Opening Brief, §22.1 D.15-11-0221, §23.1 (p. 464)	Verified.
43. Rate Base -- Working Cash -- Lead Lag Study: TURN challenged SCE's arithmetic calculation of income tax lag days, and instead proposed a weighted average of 2008-09 for federal income tax, and a five-year weighted average for state income tax. The Commission adopted TURN's recommended 5-year weighted average for state income tax, and applied the same method to federal income tax, yielding a \$103.4 million reduction to rate base as compared to SCE's request.	TURN Opening Brief, §22.4 D.15-11-021, §23.4 (p. 469)	Verified.
44. Rate Base -- Customer Deposits: TURN argued against SCE's proposal to change the utility-specific policy (since 2003) to use customer deposits as an offset to rate base, and recommended a reduction to rate base of 90% of customer deposits, while supporting SCE's community bank program for the remaining 10%. The Commission declined to adopt SCE's proposal to change policy, and used \$180.3 million of customer deposits as a rate base offset.	TURN Opening Brief, §22.5 D.15-11-021, §23.5 (p. 473)	Verified.
45. Other Issues -- SCE and Logo: TURN claimed clothing and other gear bearing SCE's name and logo are promotional and image-building in nature and should not be charged to ratepayers. On this basis, TURN proposed a \$156,000 O&M reduction and \$324,000 gross plant reduction. The Commission adopted TURN's proposal in part, and reduced gross plant by \$324,000.	TURN Opening Brief, §27.1 D.15-11-021, §28.1 (pp. 481-482)	Verified.
46. Procedural Matters: In addition to the substantive outcomes representing TURN's substantial contribution, TURN's participation made substantial contributions on several procedural matters. For example, at the outset TURN pushed for removal of SONGS- and Four Corners-related	TURN PHC Statement, 2/5/14 Scoping Memo, pp. 4-6.	Verified.

costs from the proceeding, in light of the changes in circumstances associated with each of those two plants. The Scoping Memo agreed, and directed SCE to serve supplemental testimony reflecting those changes.		
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?	Yes	Yes.
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Yes.
c. If so, provide name of other parties: Small Business Utility Advocates (SBUA), Joint Minority Parties (JMP), Coalition for Affordable Streetlights (CASL)		Agreed.
d. Intervenor's claim of non-duplication: TURN's work in a GRC is typically coordinated with other like-minded groups, and this case was no different. In light of the scope of the proceeding and the magnitude of the requested rate increase, TURN worked especially hard to achieve such coordination and, as a result, maximum coverage for ratepayers. Our time records include a number of entries (all of those coded as "coord" and also embedded in some of those coded "GP") for efforts devoted to communicating with the other intervenors about matters such as procedural strategies and issue area allocation. As is our regular practice in GRC-type proceedings, TURN closely coordinated with ORA from the earliest stages of the GRC in order to avoid and minimize duplication. Avoiding duplication entirely with ORA is nearly impossible (since the staff seeks to address nearly all issue areas covered by the utility application). Therefore the coordination effort with ORA aims to minimize duplication, and to ensure that where such duplication occurs TURN's witnesses are presenting distinct and unique arguments in support of the common or overlapping recommendations. As a result, the Commission ended up with a more robust record upon which to evaluate the issue at hand. And in a number of instances where TURN and ORA both addressed an issue, the Commission specifically adopted TURN's position. On occasion, the Commission cited with favor TURN's analysis even as it was adopting ORA's recommendation. For an example, see Section 8.1.5 (Project Management Organization in D.15-11-021. In most instances, however, TURN raised unique issues, thus broadening the overall presentation of ORA and other intervenors and avoiding duplication altogether. Several of the other intervenors representing consumer interests with potentially similar interests as those represented by TURN pursued courses which minimized the risk of overlap. For example, the Center for Accessible Technology (CforAT) presented joint testimony with SCE regarding a proposal to address accessibility issues, while the Joint Minority Parties (JMP) successfully negotiated a proposed settlement on a variety of		Verified.

issues related to underserved and hard-to-reach communities. TURN's testimony and briefs did not directly address either of those sets of issues. TURN overlapped with two other intervenors on very discrete issues – with Coalition for Affordable Streetlights (CASL) in that both opposed portions of SCE's proposed increased spending on streetlight replacements, and SBUA on incentive compensation-related issues. TURN coordinated with CASL regarding discovery and testimony preparation in an effort to minimize overlap on streetlight-related issues. TURN also had several conversations with SBUA representatives at various stages of the proceeding in an attempt to better understand the issues that group was likely to address and the positions it might take on behalf of its constituents.

In sum, the Commission should find that TURN's participation was efficiently coordinated with the participation of other intervenors wherever possible, so as to avoid undue duplication and to ensure that any such duplication served to supplement, complement, or contribute to the showing of the other intervenor. And consistent with such a finding, the Commission should determine that all of TURN's work is compensable consistent with the conditions set forth in Section 1802.5.

PART III: REASONABLENESS OF REQUESTED COMPENSATION

A. General Claim of Reasonableness (§ 1801 and § 1806):

a. Intervenor's claim of cost reasonableness:

TURN's request for intervenor compensation seeks an award of approximately \$1.6 million as the reasonable cost of our participation in the proceeding. This is a very substantial amount, one of the largest TURN has sought from the Commission. In light of the scope and quality of TURN's work, and the benefits achieved through TURN's participation in the proceeding, the Commission should have little trouble concluding that the amount requested is reasonable.

The requested compensation amount is a very small fraction of the savings directly and indirectly attributable to TURN's work. SCE's application (after revisions to remove SONGS and Four Corners) sought a 2015 increase of \$227 million over revenues at present rates. The Commission-authorized revenue requirement for 2015 was approximately \$330 million lower than the amount sought by SCE. (D.15-11-021, p. 2.) As described above in the substantial contribution section, TURN can take credit for a substantial portion of this reduction of \$330 million for 2015. Furthermore, for the most part the savings achieved in the test year will persist through the attrition years of 2016 and 2017 as well, effectively tripling the associated revenue requirement savings.

The total amount of this compensation request is also reasonable in light of recent awards of intervenor compensation to TURN for work in similar proceedings. In the 2012 SCE GRC (D.13-08-022), TURN was awarded compensation of approximately \$1.1 million for our work in that fully-litigated proceeding. In D.15-08-023, the Commission awarded approximately \$1.5 million for TURN's efforts in the 2014 PG&E GRC. In the present proceeding, TURN covered a similar (if not greater) range of issues and devoted a similar amount of time and resources in doing so.

In sum, the Commission should conclude that TURN's overall request is reasonable, particularly in light of the substantial benefits to SCE ratepayers that were attributable

CPUC Discussion

Verified.

to TURN's participation in the case.	
<p>b. Reasonableness of hours claimed:</p> <p>TURN's attorneys and consultants recorded a substantial number of hours for their work on this GRC. However, this is true of any GRC, as TURN tends to address a very broad array of issues (typically second only to ORA in terms of breadth of coverage). And in order to make a high quality showing on a broad array of issues, TURN devotes substantial time to all stages of the proceeding and all steps required for effective advocacy. SCE's application was supported by thousands of pages of testimony and workpapers, sponsored by dozens of utility witnesses. The final exhibit list indicated more than 400 exhibits. The evidentiary hearings spanned several weeks, with TURN playing a very active role throughout. The opening briefs of SCE, ORA and TURN (the most active parties) were each in excess of 300 pages. Even after the briefing effort, TURN remained busy at times with tentative initial settlement discussions and review of several rounds of update testimony or similar revisions to SCE's pending request. Finally, the release of the Proposed Decision initiated a final round of advocacy of which a substantial focus was on the repairs deduction and other issues on which TURN played a leading role.</p> <p>In nearly all cases, TURN's work is tied to one of the numerous substantial contributions described in the preceding section. However, in a few instances TURN has included hours associated with the initial work on issues that TURN ultimately did not pursue in testimony or briefs. The time entries reflect examples such as SCE's proposed funding and activities in the areas of cybersecurity, IT and insurance. The Commission should find these hours reasonable and include them in the compensation award. While TURN does not claim to have made a specific substantial contribution on each of these issue areas, the initial investigation into such areas should be recognized as reasonable part of TURN's participation and the overall substantial contribution to D.15-11-021. In a proceeding with a broad scope of issues such as this one, the Commission should reasonably expect that TURN will initially identify potential disputes that, upon further investigation and analysis, prove to be matters TURN chooses not to pursue further through testimony or briefs. Reasonable amounts of hours devoted to such efforts should be recognized as an appropriate component of an award of compensation, as such efforts are an essential part of TURN's overall participation in the proceeding.</p> <p>The number of hours for each TURN representative was reasonable under the circumstances present here:</p> <p><u>TURN Attorneys:</u></p> <p>Robert Finkelstein played numerous roles on behalf of TURN in this GRC. He served as TURN's lead and coordinating attorney throughout this proceeding. He was also responsible for several issue categories for purposes of testimony review, hearing room work (cross-examination), and briefing. Mr. Finkelstein also served as TURN's witness on several issues. TURN seeks compensation for approximately 1200 of his hours here, or the equivalent of approximately 30 weeks of full-time work spread out over the last few months of 2013, all of 2014, and portions of 2015.</p>	<p>Verified, <i>but see</i> CPUC Disallowances and Adjustments, below.</p>

Hayley Goodson and Marcel Hawiger were very active throughout the proceeding, serving as TURN's attorneys responsible for distinct issue categories and handling the associated discovery, testimony preparation and presentation, cross-examination, and briefing, among other things. TURN seeks compensation for approximately 340 hours of Ms. Goodson's work, and approximately 275 hours of Mr. Hawiger's hours here, or the equivalent of approximately 8-10 weeks of full-time work. Matthew Freedman recorded limited hours associated with his assistance on issues related to SCE's SONGS power plant, an area in which he has particular expertise and extensive experience. Elise Torres joined TURN's staff while the GRC was underway, and assumed responsibility from Mr. Finkelstein for the Incentive Compensation Program (ICP) cross-examination, briefing, and comment preparation. Thomas Long, TURN's Legal Director, recorded limited hours when he was consulted on particular strategic or substantive matters.

TURN submits that the recorded hours are reasonable, both as described above and as demonstrated in the wide-ranging substantial contribution TURN made in this proceeding. Therefore, TURN seeks compensation for all of the hours recorded by our attorneys and included in this request.

JBS Energy:

JBS Energy once again played an instrumental and essential role in TURN's participation in this GRC by covering a broad array of issues, and conducting an in-depth review of past spending patterns and forecasts for this GRC.

The members of JBS Energy engaged in a thorough review of a broad array of issues, with a correspondingly substantial number of hours invoiced for the associated of JBS Energy. This work was a critical part of TURN's success in this proceeding. In light of the breadth of TURN's substantial contribution and the dollar impact of many of the issues on which we prevailed (either in whole or in part), the Commission should have little trouble concluding that the requested amount of hours and the associated intervenor compensation is a very cost-effective investment for SCE's ratepayers.

Six members of JBS Energy's staff worked on the SCE GRC on behalf of TURN, with five of them sponsoring testimony. William Marcus's testimony covered generation, tax, meter sets forecast, working capital, various A&G accounts, and specific ratemaking adjustments. He also sponsored testimony largely developed and written by Gayatri Schilberg on issues related to pole costs, including SCE's proposals for a new Pole Loading Program, and joint pole issues. Jeff Nahigian's testimony covered corporate real estate, and customer care issues. Garrick Jones sponsored testimony on electric transmission and distribution issues, and workers compensation. And John Sugar sponsored testimony on underground structures, and short- and long-term incentive issues. Greg Ruszovan has highly-developed data analysis, compilation and presentation skills, and played a critical role in developing and performing some of the analysis reflected in the testimony and workpapers sponsored by other JBS Energy firm members. The Commission should find reasonable the requested amounts for the members of JBS Energy.

Diversified Utility Consultants, Inc.:

Jack Pous, President of DUCI, bore primary responsibility for the development and

presentation of TURN's depreciation testimony in this proceeding. He also played an important role in preparing TURN's cross-examination on depreciation-related topics, including the cross-examination of SCE's new outside expert. At times Mr. Pous was able to delegate work to Sara Coleman, a Senior Analyst at the firm, and Jessica Showalter, an Analyst, thus reducing the total cost of service to TURN. The total hours for members of DUCI (271) are substantially lower than the 350 total hours included in TURN's request for compensation in the 2012 GRC for SCE. The Commission should find reasonable the requested amounts for the members of DUCI.

Catherine Yap of Barkovich & Yap:

Catherine Yap, a principal of Barkovich & Yap, presented TURN's analysis and recommendation associated with post-test year ratemaking and attrition increases. This was only the second time in recent memory that TURN addressed such issues in a GRC. Ms. Yap played a critical role not only in the development and presentation of TURN's position in testimony, but also with preparation for hearings and drafting of TURN's brief on this topic. TURN requests approximately 330 hours in total for the work of Ms. Yap on this important and contentious issue. The Commission should find reasonable the requested amounts for Ms. Yap's work.

As explained in the earlier substantial contribution section of this request for compensation, TURN contends it should be found to have made a substantial contribution in the area of post-test year ratemaking. The adopted outcome for 2016 is very close to TURN's recommended increase for that year, and the decision to not rely on SCE's budget-based capital figures and the elimination of the anomalous outcome for 2016 under the original proposed decision further indicate TURN's substantial contribution.

Under the circumstances the Commission should find that TURN's entire showing on PTYR issues constituted a substantial contribution to the proceeding and the Commission's decision, even though the Commission did not adopt the positions TURN put forward on issues related to the specific approaches taken to escalate O&M and capital spending amounts. Such an outcome is consistent with the approach taken in D.14-05-015, the decision awarding TURN intervenor compensation for our efforts in the Sempra Utilities' 2012 GRC. In that GRC, the decision adopted the utilities' requested depreciation parameters, without any modification despite TURN having devoted substantial resources to challenging those parameters. But for compensation purposes, the Commission recognized that TURN's showing was of a quality that still represented a substantial contribution to the proceeding and the resulting decision on the merits. As a result, it found the full amount of depreciation-related hours reasonable and compensable. The Commission should reach a similar conclusion here with regard to the PTYR-related effort and the associated hours, and award TURN the full amount requested for PTYR-related work.

Bruce Lacy:

Bruce Lacy has served as TURN's witness in nuclear decommissioning-related proceedings for several years. Here Mr. Lacy recorded a small number of hours assisting TURN in the analysis and pursuit of issues related to the appropriate treatment of SONGS marine mitigation costs in light of the plant's shutdown.

Meetings, discussions and activities involving more than one TURN attorney or expert witness: A relatively small percentage of hours and hourly entries reflect internal and external meetings or other events involving two or more of TURN's attorneys and expert witnesses. In past compensation decisions the Commission has deemed such entries as reflecting internal duplication that is not eligible for an award of intervenor compensation. This is not the case here. For the meetings that were among TURN's attorneys and expert witnesses, such meetings are essential to the effective development and implementation of TURN's strategy for this proceeding. None of the attendees are there in a duplicative role – each is an active participant, bringing his or her particular knowledge and expertise to bear on the discussions. As a result, TURN is able to identify issues and angles that would almost certainly never come to mind but for the “group-think” achievable in such settings.

There were also meetings with other parties at which more than one attorney represented TURN on occasion. And for some events (such as the final oral argument), TURN had more than one attorney in attendance, even though a single attorney made TURN's presentation. The Commission should understand that such coverage is often essential in a case such as this one, given its wide range of issues that no single person is likely to master. Wherever TURN's request includes time for more than a single representative for a given event, such coverage was necessary in order to achieve the meeting's or event's purpose. TURN submits that active participation in such meetings and events can be part of an intervenor's effective advocacy before the Commission, and that intervenor compensation can and should be awarded for the time of all participants in such meetings where, as here, each participant needed to be in the meeting to advance the intervenor's advocacy efforts.

Depreciation-related Time: TURN seeks compensation for the hours associated with work on depreciation-related issues. This includes the hours billed to TURN by Jack Pous of DUCI, and hours recorded by TURN's staff attorney Finkelstein who handled the issue on behalf of TURN. Given TURN's substantial contribution on depreciation- and decommissioning-related issues, the Commission should find reasonable the full amount of hours requested for work on those issues.

Compensation Request Preparation Time: TURN is requesting compensation for 28.0 hours devoted to compensation-related matters, primarily preparation of this request for compensation (27.25 hours). While higher than the number of hours TURN tends to seek for compensation-related matters, this is a reasonable figure in light of the size and complexity of the request for compensation itself. The number of hours devoted to a request for compensation is driven in large part by the number of individuals and daily time entries involved in the substantive work. For example, the greater the number of individuals and associated time entries, and the greater the likelihood that the request will need to address a new hourly rate for some of those individuals. The Commission awarded compensation for similar amounts of compensation-related hours in GRCs in D.15-08-023 (PG&E 2014 GRC), D. 13-08-022 (SCE 2012 GRC) and D.14-05-015 (Sempra Utilities 2012 GRC).

Mr. Finkelstein prepared this request for compensation because his extensive knowledge of many aspects of this proceeding, combined with his experience with GRCs in general, enabled him to prepare the request in a more efficient manner than if

it were prepared by one of the other attorneys. Also, the number of compensation-related hours requested, while higher than the figure in a typical TURN request for compensation, reflects efficiency achieved due to TURN's ability to rely on recently-filed requests covering many of the same attorneys and witnesses for the same period of time.

In sum, the Commission should find that the number of hours claimed is fully reasonable in light of the complexity of the issues and TURN's relative success on the merits.

c. Allocation of hours by issue:

TURN has allocated all of our attorney and consultant time by issue area or activity, as evident on our attached timesheets. The following codes relate to general activities that are part of nearly all CPUC proceedings, such as tasks associated with general participation, procedural matters, and coordination with other parties, as well as the specific substantive issue and activity areas addressed by TURN in this proceeding.

Code	Stands for:
GP	General Participation -- work that is essential to TURN's participation but would not vary with the number of issues that TURN addresses, for the most part. This code appears most regularly during early stages of broad reviews, such as the initial review of the application and testimony, the initial inquiry into issues areas that TURN opted not to pursue (such as Information Technology and Cybersecurity proposals here), and other tasks that are of a more general nature.
GH	General Hearing -- Hearing-related (preparation and participation), but not issue-specific. There are a number of general tasks that fall upon any intervenor actively participating in evidentiary hearings, such as dealing with scheduling and similar issues. In addition, due to the nature of GRC hearings and witness scheduling, TURN attorneys spent time in the hearing room waiting for the witness they would cross-examine to take the stand. To the extent possible, TURN's attorneys used the time in the hearing room to perform other substantive work (such as preparing for the NEXT witness in queue), with the time recorded to the related substantive issue.
Comp Ex	Comparison Exhibit -- Preparation of TURN positions for inclusion in Comparison Exhibit; review of draft of exhibit
PD	Proposed Decision -- work on reviewing, analyzing, commenting on, lobbying on, strategizing on the Proposed Decision and revisions thereto.
Proc	Procedural -- Procedural matters such as non-hearing scheduling matters, joint briefing outline, NDA and other confidentiality issues, etc. In this GRC, this code also covers TURN's initial motion for a GRC memo account.
Coord	Coordination with other parties -- meetings, e-mails and phone calls w/ ORA and other intervenors about issue coverage, etc.

Policy	Substantive work on policy issues, including cost/benefit analysis, the appropriateness of relying on 2013 recorded data, and safety-related spending	
A&G	Administrative and General	
CRE	Corporate Real Estate	
CWC	Cash Working Capital and related rate base issues	
CustSvc	Customer Service, including metering-related issues, customer service office, and billing.	
Decomm	Decommissioning – generation plant decommissioning issues	
Dep	Depreciation -- TURN's attorney's and expert witness's time sheets reflect allocation to a general depreciation category. It is often difficult to precisely allocate hours to depreciation-related sub-issues (Net Salvage or ASL, for example). TURN provides a rough general allocation: 30% Net Salvage, 40% ASL, 30% General. However, as noted earlier, TURN seeks an award for all depreciation-related hours, consistent with both the breadth of our substantial contribution on depreciation-related issues, and the outcomes adopted in D.14-05-015 (Semptra 2012 GRC) and D.13-08-022 (SCE 2012 GRC).	
Gen	Generation – Fossil-related issues	
Hydro	Generation – Hydro-related issues	
HR	Human Resources – pensions and benefits, medical costs, workers comp, relocation benefits, etc. In this GRC, TURN's work in this category was primarily on workers compensation-related issues.	
ICP	Incentive Compensation Plans – includes short- and long-term incentive payment issues, including Results Sharing and a substantial portion of TURN's review and analysis of SCE's Operational Excellence campaign	
Law	Law department and claims-related costs.	
MS	Meter Sets and customer forecasts	
MarMit	Marine Mitigation – SONGS marine mitigation-related proposals	
Name/Logo	Ratemaking treatment of promotional items with utility name or logo	
NTP&S	Non-tariffed Products and Services (within OOR)	
PTYR	Post Test Year Ratemaking.	
Poles	SCE-proposed Pole Loading Program, joint pole issues, other pole-related issues	
Prepay	Issues related to SCE prepayment program proposal included in original showing, then removed in revised testimony	
Rate Base	Ratemaking issues related to calculation of utility rate base, such as rate base offset treatment of customer deposits	
RIIM	Reliability Investment Incentive Mechanism – issues related to SCE proposal and TURN/CUE alternative for revisions to mechanism	
RO	Results of Operation	

Sett	Review of settlements reached by other parties, comments on those settlements, and efforts related to attempt to settle revenue requirement with SCE.	
SONGS	Removal of SONGS- and Four Corners-related costs from SCE application and testimony as originally filed	
T&D	Electric transmission and distribution, including underground vaults and streetlights	
Tax	Tax-related issues, including repairs deduction issue	
Update	Review and response to SCE's multiple rounds of update testimony, including preparation of TURN update to tax calculations in TURN's testimony	
Comp	Time devoted to compensation-related pleadings	
#	Time entries that cover substantive issue work that cannot easily be identified with a specific activity code. In this proceeding the time entries coded # represent a relatively small portion of the total hours (less than 4%). TURN requests compensation for all of the time included in this request for compensation, and therefore does not believe allocation of the time associated with these entries is necessary. However, if such allocation needs to occur, TURN proposes that the Commission allocate these entries in equal 25% shares to the broader issue-specific categories described above that were most likely to have work covered by a # entry (T&D, ICP, CustServ, and A&G).	
TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission's rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.		

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$ [A]
Robert Finkelstein	2013	107.25	\$490	D.14-05-015	\$52,552.50	107.25	\$490.00	\$52,552.50
R. Finkelstein	2014	977.50	\$505	D.15-08-023	\$493,637.50	977.50	\$505.00	\$493,637.50
R. Finkelstein	2015	86.50	\$505	2014 Rate	\$43,682.50	86.50	\$505.00	\$43,682.50
Hayley Goodson	2013	7.50	\$345	D.15-05-019	\$2,587.50	7.50	\$345.00	\$2,587.50
H. Goodson	2014	299.75	\$355	D.15-08-023	\$106,411.25	299.75	\$355.00	\$106,411.25

H. Goodson	2015	34.75	\$355	2014 Rate	\$12,336.25	34.75	\$355.00	\$12,336.25
Marcel Hawiger	2013	3.5	\$400	D.14-05-015	\$1,400.00	3.5	\$400.00	\$1,400.00
M. Hawiger	2014	258.0	\$410	D.15-08-023	\$105,780.00	258.00	\$410.00	\$105,780.00
M. Hawiger	2015	14.5	\$410	2014 Rate	\$5,945.00	14.5	\$410.00	\$5,945.00
Matthew Freedman	2013	0.5	\$400	D.14-11-019	\$200.00	0.5	\$400.00	\$200.00
M. Freedman	2014	8.25	\$410	D.15-08-023	\$3,382.50	8.25	\$410.00	\$3,382.50
Elise Torres	2014	138.25	\$215	See Comment 1, below.	\$29,885.00	138.25	\$215.00	\$29,723.75
E. Torres	2015	18.75	\$215	See Comment 1, below.	\$4,031.25	18.75	\$215.00	\$4,031.25
Thomas Long	2013	2.0	\$555	D.14-05-015	\$1,110.00	2.00	\$555.00	\$1,110.00
T. Long	2014	0.75	\$570	D.15-06-021	\$427.50	0.75	\$570.00	\$427.50
William Marcus	2013	9.9	\$265	D.14-05-015	\$2,623.50	9.9	\$265.00	\$2,623.50
W. Marcus	2014	351.25	\$270	D.15-08-023	\$94,837.50	351.25	\$270.00	\$94,837.50
W. Marcus	2015	9.25	\$270	See Comment 2, below.	\$2,497.50	9.25	\$270.00	\$2,497.50
Garrick Jones	2013	7.25	\$155	D.14-05-015	\$1,123.75	7.25	\$155.00	\$1,123.75
G. Jones (through 9/30/14)	2014	509.80	\$155	D.14-05-015 (for 2013 work)	\$79,019.00	509.80	\$155.00	\$79,019.00
G. Jones (10/1/14-on)	2014	84.32	\$180	D.15-11-019	\$15,177.60	84.32	\$180.00	\$15,177.60
G. Jones	2015	2.44	\$180	See Comment 2, below.	\$439.20	2.44	\$180.00	\$439.20
Greg Ruszovan	2014	59.45	\$205	D.15-08-023 (for 2013 work)	\$12,187.25	59.45	\$205.00	\$12,187.25
Jeff Nahigian	2013	10.5	\$205	D.14-05-015	\$2,152.50	10.5	\$205.00	\$2,152.50
J. Nahigian	2014	551.25	\$205	D.15-08-023	\$113,006.25	551.25	\$205.00	\$113,006.25
John Sugar	2013	146.66	\$210	D.14-05-015	\$30,798.60	146.66	\$210.00	\$30,798.60
J. Sugar	2014	677.23	\$210	D.15-08-023	\$142,218.30	677.23	\$215.00	\$145,604.45
J. Sugar	2015	0.92	\$210	See Comment 2,	\$193.20	0.92	\$215.00	\$197.80

				below.				
Gayatri Schilberg	2013	27.81	\$210	D15-08-023	\$5,840.10	27.81	\$210.00	\$5,840.10
G. Schilberg	2014	286.22	\$210	D.15-08-023	\$60,106.20	286.22	\$215.00	\$61,537.30
Jack Pous	2013	14.5	\$230	D.15-08-023	\$3,335.00	14.5	\$230.00	\$3,335.00
J. Pous	2014	218.5	\$230	D.15-08-023	\$50,255.00	218.50	\$235.00 See Res. ALJ-303	\$51,347.50
Sara Coleman	2014	19.0	\$130	D.15-08-023 (for 2013 hours)	\$2,470.00	19.00	\$135.00 See Res. ALJ-303	\$2,565.00
Jessica Showalter	2014	19.0	\$75	D.15-08-023 (for 2013 hours)	\$1,425.00	19.0	\$75.00	\$1,425.00
Catherine Yap	2014	321.75	\$275	D.15-08-023	\$88,481.25	321.75	\$280.00 See D.15-08-023	\$90,090.00
C. Yap	2015	13.0	\$275	D.15-08-023 (for 2013-14)	\$3,575.00	13.0	\$280.00	\$3,640.00
Bruce Lacy	2014	5.5	\$365	D.15-11-019	\$2,007.50	5.5	365.00	\$2,007.50
Subtotal: \$ 1,576,976.70						Subtotal: \$1,584,659.80		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
R. Finkelstein	2014	0.75	\$252.50	½ of approved 2014 rate	\$189.38	0.75	252.50	189.38
R. Finkelstein	2015	13.50	\$252.50	½ of approved 2014 rate	\$3,408.75	13.50	252.50	3,408.75
R. Finkelstein	2016	13.75	\$252.50	½ of approved 2014 rate	\$3471.87	7.75 [1]	252.50	1,956.88
Subtotal: \$7,070.00						Subtotal: \$5,555.01		
COSTS								
#	Item	Detail			Amount	Amount		
	Photocopying	Copies made of TURN pleadings for service, and copying charges from consultant billings			\$2,688.82	\$2,688.82		
	Postage	Expenses for postage for this			\$65.71	\$65.71		

		proceeding		
	Overnight delivery	Materials mailed for express delivery to SCE or to TURN consultants related to work in this proceeding	\$104.02	\$104.02
	Phone	Charges associated with TURN's work in this proceeding, including costs of conference calls	\$151.19	\$151.19
	Computerized Research	Computerized research costs associated with preparation of TURN's strategy and pleadings for this proceeding	\$289.51	\$289.51
Subtotal: \$3,299.25				Subtotal: \$3,299.25
TOTAL REQUEST: \$ 1,587,345.95				TOTAL AWARD: \$1,593,514.06
<p>**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate.</p>				
ATTORNEY INFORMATION				
Attorney	Date Admitted to CA BAR¹		Member Number	Actions Affecting Eligibility (Yes/No?)
Robert Finkelstein	June 13, 1990		146391	No
Hayley Goodson	December 5, 2003		228535	No
Marcel Hawiger	January 23, 1998		194244	No
Matthew Freedman	March 29, 2001		214812	No
Thomas Long	December 11, 1986		124776	No
Elise Torres	December 2011		280443	No, but inactive from 01/28/2013 until 01/01/2014.

C. Attachments Documenting Specific Claim and Comments on Part III

Comment #	Intervenor's Comment(s)
Comment 1	<p>2013, 2014 and 2015 Hourly Rates for All TURN Representatives</p> <p>For 2013 hours, TURN has used the hourly rates already approved for work performed in that year by TURN's attorneys and consultants. The same is true with one exception for 2014. Elise Torres joined TURN's staff in 2014, and the requested rate of \$215 has been requested but not yet addressed in several pending requests for compensation (R.13-12-011 (Water-</p>

¹ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

	<p>Energy Nexus) and A.12-08-007 (ME&O)). TURN has not repeated here the justification presented in those pending requests for the \$215 rate sought for Ms. Torres. Should the Commission determine it needs such justification presented here, TURN requests the opportunity to submit a revised compensation request to include such information.</p> <p>For 2015 hours, TURN is requesting compensation using the rates authorized or pending for 2014. This approach is generally consistent with the Commission's decision in Resolution ALJ-308 to not adopt a cost of living adjustment for 2015 for intervenor compensation purposes.</p>
Comment 2	<p>2015 Hourly Rates for JBS Energy</p> <p>JBS Energy increased the hourly rate for its firm members as of 1/1/15. However, due to the relatively small number of 2015 hours the firm recorded for this proceeding, TURN seeks only the previously authorized 2014 rate for those hours. TURN asks that the Commission to NOT treat the decision on this compensation request as setting a 2015 hourly rate for any member of JBS Energy, as the actual 2015 hourly rates will be sought and justified in future compensation requests.</p>
Comment 3	<p>Expenses – TURN has included the reasonable expenses incurred associated with our participation in this proceeding. The photocopying expense is higher than typical, as one would expect given the greater than typical number of witnesses sponsoring testimony (with voluminous attachments) on behalf of TURN. The postage, overnight delivery, and phone expenses were all associated exclusively with TURN's work in this proceeding. TURN also incurred computerized research costs associated with the preparation of its testimony and pleadings.</p>

D. CPUC Disallowances and Adjustments:

Item	Reason
[A]	<p>The Commission reminds TURN that Rule 1.1 of the Rules of Practice and Procedure requires intervenors "to maintain the respect due to the Commission, members of the Commission and its Administrative Law Judges." Rule 1.1. This requirement extends to participation in Public Participation Hearings (PPH). Any party acting in violation of Rule 1.1 may be subject to sanctions. As we stated in Decision 05-10-041, an appropriate sanction is the disallowance of intervenor compensation for unreasonable conduct. <i>See</i> D.05-10-041 at 75; <i>see also</i> D.06-09-025 at 17-18.</p> <p>In this proceeding, TURN's Executive Director engaged in wholly disruptive behavior at the PPH on May 29, 2014. Although the Commission does not compensate intervenors for hours claimed related to PPHs, we take this opportunity to remind TURN of the Rule 1.1 requirements and note that if TURN's representatives continue such disorderly conduct in future PPHs, the Commission will reduce awards of intervenor compensation as allowed under Rule 1.1</p>
[1]	<p>The Commission notes that the claim for intervenor compensation is excessive. TURN could have utilized a less expensive attorney to prepare the claim. In addition, much of TURN's discussion in Part III did not aid in the Commission's understanding of TURN's contributions to the proceeding. The Commission removed 6 hours from Finkelstein's 2015 hours related to intervenor compensation.</p>

PART IV: OPPOSITIONS AND COMMENTS

A. Opposition: Did any party oppose the Claim?	No.
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	Yes.

FINDINGS OF FACT

1. TURN has made a substantial contribution to D.15-11-021.
2. The requested hourly rates for TURN's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$1,593,514.06.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. The Utility Reform Network shall be awarded \$1,593,514.06.
2. Within 30 days of the effective date of this decision, Southern California Edison Company shall pay The Utility Reform Network the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning March 27, 2016, the 75th day after the filing of The Utility Reform Network's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.

This decision is effective today.

Dated _____, 2016, at San Francisco, California.

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D1511021		
Proceeding(s):	A1311003		
Author:	ALJ Dudney		
Payer(s):	Southern California Edison Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network (TURN)	1/11/16	\$1,587,345.95	\$1,593,514.06	N/A	See CPUC Disallowances and Adjustments, above.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Robert	Finkelstein	Attorney	TURN	\$490	2013	\$490.00
Robert	Finkelstein	Attorney	TURN	\$505	2014	\$505.00
Robert	Finkelstein	Attorney	TURN	\$505	2015	\$505.00
Hayley	Goodson	Attorney	TURN	\$345	2013	\$345.00
Hayley	Goodson	Attorney	TURN	\$355	2014	\$355.00
Hayley	Goodson	Attorney	TURN	\$355	2015	\$355.00
Marcel	Hawiger	Attorney	TURN	\$400	2013	\$400.00
Marcel	Hawiger	Attorney	TURN	\$410	2014	\$410.00
Marcel	Hawiger	Attorney	TURN	\$410	2015	\$410.00
Matthew	Freedman	Attorney	TURN	\$400	2013	\$400.00
Matthew	Freedman	Attorney	TURN	\$410	2014	\$410.00
Elise	Torres	Attorney	TURN	\$215	2014	\$215.00
Elise	Torres	Attorney	TURN	\$215	2015	\$215.00
Thomas	Long	Attorney	TURN	\$555	2013	\$555.00
Thomas	Long	Attorney	TURN	\$570	2014	\$570.00
William	William	Expert	TURN	\$265	2013	\$265.00
William	William	Expert	TURN	\$270	2014	\$270.00
William	William	Expert	TURN	\$270	2015	\$270.00
Garrick Jones	Jones	Expert	TURN	\$155	2013	\$155.00
Garrick	Jones	Expert	TURN	\$155	2014 (through 9/30/14)	\$155.00
Garrick	Jones	Expert	TURN	\$180	2014 (10/1/14-on)	\$180.00

Garrick	Jones	Expert	TURN	\$180	2015	\$180.00
Greg	Ruszovan	Expert	TURN	\$205	2014	\$205.00
Jeff	Nahigian	Expert	TURN	\$205	2013	\$205.00
Jeff	Nahigian	Expert	TURN	\$205	2014	\$205.00
John	Sugar	Expert	TURN	\$210	2013	\$210.00
John	Sugar	Expert	TURN	\$210	2014	\$215.00
John	Sugar	Expert	TURN	\$210	2015	\$215.00
Gayatri	Schilberg	Expert	TURN	\$210	2013	\$210.00
Gayatri	Schilberg	Expert	TURN	\$210	2014	\$215.00
Jack	Pous	Expert	TURN	\$230	2013	\$230.00
Jack	Pous	Expert	TURN	\$230	2014	\$235.00
Sara	Coleman	Expert	TURN	\$130	2014	\$135.00
Jessica	Showalter	Expert	TURN	\$75	2014	\$75.00
Catherine Yap	Yap	Expert	TURN	\$275	2014	\$280.00
Catherine	Yap	Expert	TURN	\$275	2015	\$280.00
Bruce	Lacy	Expert	TURN	\$365	2014	365.00

(END OF APPENDIX)